

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

DAVID B. POPKIN FOLLOW-UP INTERROGATORIES TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-147-148]

May 9, 2003

Pursuant to Order No. 1320, I hereby submit a follow-up interrogatory to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

Respectfully submitted,

May 9, 2003

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

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DBP/USPS-147 Please refer to your response to DBP/USPS-23 as revised May 2, 2003. [a] This interrogatory contemplated that whatever records the Postal Service was able to locate would be filed as a Library Reference so that the information would be available to all participants and would also be made a part of the permanent record of this Docket. Please advise when they will be filed. [b] This interrogatory asked that the Postal Service "provide an explanation of the types and extent of changes that occurred between each of the versions provided." Please evaluate each of the available media and provide the response to the interrogatory as originally requested.

DBP/USPS-148 Please refer to your response to DBP/USPS-39. Your response indicated that there was no data to define the accuracy of PC Miler versus competed products with *specific* regard to "travel time". I was not interested in a comparison between PC Miler and other competing products. As stated in the original interrogatory,

I am interested in a comparison between PC Miler and actual travel time. Please provide the requested information.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12 and the order authorizing Electronic Service for this Docket.

May 9, 2003

David B. Popkin